Open Payments

Phase 1 Step-by-Step CMS Enterprise Portal Registration for Physicians and Teaching Hospitals

OPEN PAYMENTS

CREATING PUBLIC TRANSPARENCY INTO INDUSTRY-PHYSICIAN FINANCIAL RELATIONSHIPS

June 2014

CMS Disclaimer: This information is a summary of the final rule implementing Open Payments (Medicare, Medicaid, Children's Health Insurance Programs; Transparency Reports and Reporting of Physician Ownership or Investment Interests [CMS-5060-F], codified at 42 CFR Parts 402 and 403) The summary is not intended to take the place of the final rule which is the official source for information on the program.

Open Payments (the Sunshine Act) Review

Who is responsible for reporting?

Applicable manufacturers of covered products AND entities under common ownership with applicable manufacturers who also provide assistance and support are required to annually report to CMS:

- Payments or other transfers of value made to physicians and teaching hospitals.
- Certain ownership or investment interests held by physician owners or investors or their immediate family members.

Applicable group purchasing organizations (GPOs) are required to annually report to CMS:

- Payments or other transfers of value made to physicians.
- Certain ownership or investment interests held by physician owners or investors and their immediate family members.

Open Payments (the Sunshine Act) Review

Who is reported on?

Covered Recipient Physicians	Covered Recipient Teaching Hospitals	Physician Owners or Investors
• Doctors of medicine or osteopathy practicing medicine or surgery • Doctors of dental medicine or dental surgery practicing dentistry • Doctors of podiatric medicine • Doctors of optometry • Chiropractors • All legally authorized by the state to practice	• The hospitals that CMS has recorded as receiving payment(s) under Medicare direct graduate medical education (GME), indirect medical education (IME) or psychiatric hospitals IME programs • Each year, Open Payments publishes a list of affected teaching hospitals; the list is available on the Open Payments website at http://go.cms.gov/openpayments	• Physicians who are owners or investors of an applicable manufacturer or GPO • Immediate family members who have ownership or investment interest in an applicable manufacturer or GPO: spouse, natural or adoptive parent, child, or sibling, stepparent, stepchild, stepbrother, or stepsister, father-, mother-, daughter-, son-, brother-, or sister-in-law, grandparent or grandchild, spouse of a grandparent or grandchild

Open Payments (the Sunshine Act) Registration Overview

Registration Overview

- Registration is **required** for physicians and teaching hospitals to review or dispute the following information reported about them by applicable manufacturers and GPOs:

  - Payments made to physicians and teaching hospitals,

  - Other transfers of value made to physicians and teaching hospitals, or

  - Ownership or investment interests held by physicians or their immediate family members

- Registration will be conducted in two phases this first reporting year.

Phase 1 Registration for Physicians and Teaching Hospitals: EIDM

- Begins June 1, 2014
  - Physicians and teaching hospitals register in EIDM
  - Request access to the Open Payments system via EIDM

NOW!

Phase 2 Registration for Physicians and Teaching Hospitals: Open Payments System

- Begins July 2014

  - Physicians and teaching hospitals use EIDM registration credentials to register in the Open Payments system

  - Once physicians and teaching hospitals are registered in the Open Payments system, they are able to participate in the review, and dispute process

July 2014

*Guidance on how to use EIDM registration credentials to register in the Open Payments system, and how to review and dispute submitted data is forthcoming

Phase 1 Registration in EIDM: Identity Verification Process

EIDM Identity Verification Overview

- CMS' Enterprise Identity Management system (EIDM) is how CMS verifies user identities

- Identity verification is the process of providing information (e.g., identity history, credentials, or documents) for the purpose of proving that a person is the same person he or she claims to be

- Individuals requesting electronic access to CMS protected information or systems must first have their identities verified

EIDM Identity Verification (cont.)

- All users who register for EIDM have their identities verified

- EIDM matches information entered by users to information provided by Experian

- Out of Wallet (OOW) questions are also used to verify identity

- OOW questions ask for private data and contain information pulled from your credit report such as:

  - Mortgage lender name

  - Previous employer name

  - Auto lender name

- OOW questions and answers are shared **only** between the EIDM registrant and the verification service provider, Experian; the information will **not** be stored in EIDM

EIDM Identity Verification (cont.)

- A soft credit inquiry will be made during EIDM registration

- Soft credit inquiries are visible only to the EIDM registrant and **only** appear on credit reports produced by Experian (shown as an inquiry made by CMS)

- Identity proofing does **not** affect credit score

- Contact Experian Proofing Support Services for assistance with failed identity proofing: 1-866-578-5409

Phase 1 Registration:
EIDM New User Registration

EIDM Registration Overview

- EIDM registration is required for access to the Open Payments system

- EIDM registration process is the same for all users

- You may already have an EIDM account if you use the Health Insurance Oversight System (HIOS), the Medicaid and CHIP Program System (MACPro), or other CMS systems

Step 1: Go to CMS Enterprise Portal and Select "New User Registration"

https://portal.cms.gov

Step 2: Accept Terms & Conditions

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Step 2: Accept Terms & Conditions (cont.)

- Two sections are particularly important to read:

    1. Consent to monitoring

    2. Collection of Personal Identifiable Information or PII

- *Consent to monitoring* means that you agree to allow CMS to monitor you while you are on systems accessed through EIDM

- *PII* is information that can be used to uniquely identify, contact, or locate a single person or can be used with other sources to uniquely identify a single individual; PII is collected to aid in the identity verification process

- Identity verification is required for all users requesting access to any CMS application

- Personal information collected will be used for the purposes of verifying your identity **only**

- Once you have read the terms and conditions, check the box labeled "I agree to the terms and conditions" before selecting "Next" to continue

Step 3: Enter Personal Information

Required fields are marked with an asterisk.

Completing all fields, even those that are not required, will speed-up identity verification.

Step 4: Select User ID, Password, and Challenge Questions

User ID and Password Criteria

- User ID
  - Must be a minimum of 6 and a maximum of 74 characters
  - Special characters permitted: dashes (-), underscores (_), apostrophes ('), periods (.), and at signs (@)
- Password
  - Must be a minimum of 8 and a maximum of 20 characters
  - Must contain at least 1 number, 1 uppercase letter, and 1 lowercase letter
  - Cannot contain your user ID and must differ from your previous 6 passwords
  - Must be changed every 60 days
  - EIDM will prompt for password change when the 60 day deadline approaches

Step 5: Registration Complete

Click on "OK" to exit and return to the CMS Enterprise Portal home page.

After clicking on OK, you will receive a confirmation email message that contains your user ID and a link to the CMS Enterprise Portal.

Confirmation Email

From:	☐ donotreply@cms.gov	Sent:	Mon 5/5/2014 2:13 PM
To:			
Cc:			
Subject:	Enterprise Identity Management System (EIDM) Account Registration		

Dear Jane Taylor

Thank you for registering. The User ID that you have chosen is OUTUSER21. You can log in to the CMS Portal using the following link with your User ID and Password.
Please keep this E-mail for your records.
https://portalval.cms.gov

Thank you,
CMS Enterprise Identity Management System

Please do not reply to this system generated E-mail.

Unsuccessful EIDM Registration

- Individuals with addresses outside of the United States may not register successfully in EIDM

- They should contact the Open Payments Help Desk for assistance with EIDM registration

- Any additional EIDM issues should be directed to the Open Payments Help Desk at openpayments@cms.hhs.gov

Using EIDM Registration Credentials to Request Access to the Open Payments System

Requesting Access to the Open Payments System

- In Phase 2 registration, this request in EIDM will allow the individual access to the Open Payments system

- Request for this access can occur only after EIDM registration is successful

- Request for this access is made through the CMS Enterprise Portal

Step 1: On CMS Enterprise Portal, select "Login to CMS Secure Portal"

Step 2: Accept Terms & Conditions

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Step 3: Enter EIDM User ID and Password

Step 4: Select "Request Access Now" under "Request Application Access"

After a successful CMS Enterprise Portal login, you will be taken to the CMS Portal home page (shown below).

Step 5: Select "Request New Application Access"

If you have access to other CMS applications, you will see those applications listed in the "View and Manage My Access" table.

Step 6: Select Application and Role

- Application Description: "Open Payments"
- Role: "Applicable Manufacturer, GPO, Physician, or Teaching Hospital"

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Step 7: Review Identity Verification Information

Step 8: Accept Terms & Conditions
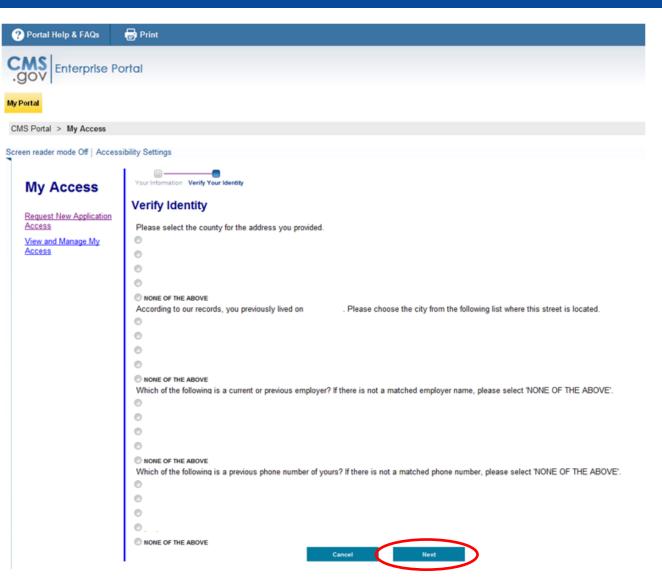
Step 9: Confirm Your Information

Some fields will be pre-populated with information from your EIDM profile.

Confirm its accuracy; edit fields to correct errors.

Step 9: Confirm Your Information (cont.)

Enter your current or most recent home address, as it may be required for identity verification.

- Home Address Line 1:

Home Address Line 2:

- City: - State: - Zip Code: Zip Code Extension: Country: USA

Enter your primary phone number, as it may be required for identity verification.

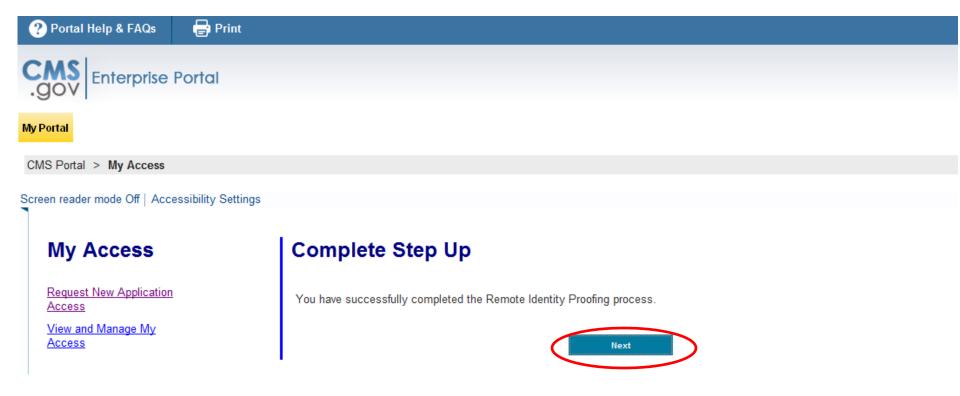- Primary Phone Number:

Cancel   Next
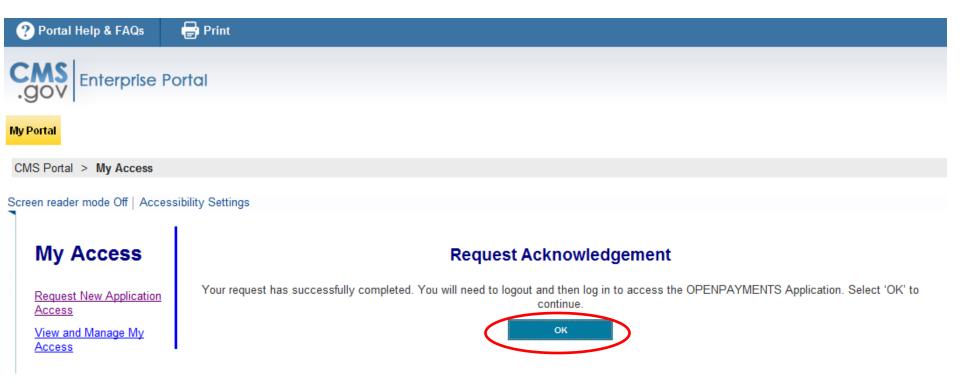
Step 10: Verify Identity

As previously explained, identity proofing questions are pulled from the "soft-credit" inquiry done during EIDM registration.

"Out-of-Wallet" (OOW) questions are based upon information in your credit report.

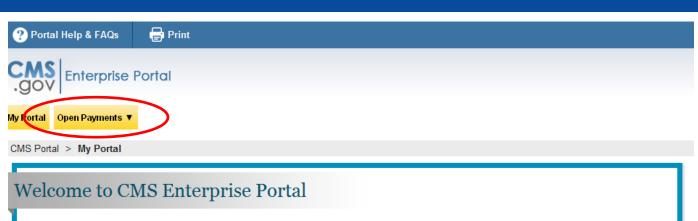# Step 11: Verifying Identity Successful

Step 12: Requesting Application Access Successful

- Access may take a few minutes to process
- Log out of EIDM and log back in to view if it was successful

Open Payments Access Successful

Log back into the CMS Enterprise Portal to see the Open Payments tab in the menu bar at the top of the screen.

It may take a few minutes for the Open Payments tab to appear.

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Next Steps

What You Can Do Now

- Complete Phase 1 by:
  - Registering for your EIDM user ID and password

  - Requesting access to the Open Payments system via EIDM

- Review resources on the CMS Open Payments website: http://go.cms.gov/openpayments

- Register on CMS listserv to receive e-mail updates about the Open Payments program – go to http://go.cms.gov/openpayments and enter email address on the main page, in the "Email Updates" box

2014 Open Payments Timeline

Feb	March	April	May	June	July	Aug	Sept

Phase 1 Registration and Submission
 	
• Applicable manufacturers and applicable GPOs
 	
• Submission of corporate profile and aggregate data
				Phase 2 Registration and Submission For Industry
				
				• Applicable manufacturers and applicable GPOs
				
				   • Step 1 – June 1 – June 30
				
				   • Step 2 – June 9 – June 30
				
				Phase 1 Registration for Physicians and Teaching Hospitals
				
				• CMS Enterprise Portal (EIDM)
					Phase 2 Registration for Physicians and Teaching Hospitals
					
					• Open Payments system
					
					Review, Dispute, and Corrections
							Detailed data published on public-facing CMS website

Resources Available

- CMS Open Payments website: http://go.cms.gov/openpayments

  – "Physician" and "Teaching Hospital" pages of the website

  – "Events" page: Open Payments technology-focused webinar recordings and materials, plus a schedule of upcoming webinars

  – "Program Registration" page: Supplemental materials, instruction documents, FAQs & other resources

- Open Payments Help Desk:

  – openpayments@cms.hhs.gov or 855-326-8366